FILED 1st JUDICIAL DISTRICT COURT
Santa Fe County
9/29/2023 1:59 PM
KATHLEEN VIGIL CLERK OF THE COURT
Amy T Ruiz

FIRST JUDICIAL DISTRICT COUNTY OF SANTA FE STATE OF NEW MEXICO

BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of the property of th

Plaintiff,

vs.

Cause No. \_\_D-101-CV-2023-02404

Case assigned to Ellenwood, Kathleen McGar

SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES

Defendants.

#### PLAINTIFF'S ORIGINAL COMPLAINT FOR DAMAGES FOR WRONGFUL DEATH

Plaintiff, by and through her undersigned attorneys, for her causes of action against the Defendants, would show the Court the following:

#### GENERAL ALLEGATIONS

- Plaintiff is the duly appointed representative of the Estate of Brianna Romero for purposes of this wrongful death lawsuit. The Order for the Appointment of Personal Representative for the Estate of Brianna Romero is attached hereto as Exhibit "A".
- Defendant Santa Fe County is a unit of local government that is created by the New Mexico legislature. The City of Santa Fe is a municipality.
- Defendants Ceasar Ornelas and Richard Hildebrant are police officers employed by the City of Santa Fe.
- 4. Defendant Derek Williams is the warden of the Santa Fe County Detention Center, responsible for the employees and operations of the Detention Center. Defendant

- Melquiades Olivares is the medical director of the Detention Center responsible for the delivery of proper medical care at the Detention Center.
- Venue is proper in this Court because all parties reside in this county and the events giving rise to this lawsuit occurred in Santa Fe County.
- 6. The morning of September 30, 2021, Brianna Romero, then 20 years of age, was arrested and taken to the Santa Fe County Detention Center ("Detention Center") by City of Santa Fe police officers, where she was booked and placed in a cell. Defendant Hildebrant made the arrest and the decision to transport Brianna to the jail rather than the hospital.
- Brianna collapsed in her cell, an ambulance was called, and she was transported to Presbyterian Medical Center in Santa Fe, at approximately 12:44 PM.
- 8. Brianna Romero was discharged from Presbyterian Medical Center at approximately 5:45 PM on September 30, 2021, and was transported back to the detention center by Ceasar Ornales, a Santa Fe police officer, one of the Defendants, who was at the hospital with Brianna to maintain custody over her.
- 9. The Santa Fe County Detention Center is a jail operated by Santa Fe County, through the Santa Fe County Sheriff's Department. The employees of the detention center are all agents and employees of Santa Fe County.
- 10. Upon her discharge from the hospital, Brianna Romero and Defendant Ornales were provided with discharge instructions from the Emergency Room physician which provided, among other things, that she should be carefully monitored and that she should come back to the emergency room should she have any further medical difficulties.

- 11. Upon information and belief, the discharge papers with the instructions were provided to and in the custody of Defendant Ornales or other City of Santa Fe police officers who were at the hospital with Ornales.
- 12. Alternatively, Ornales had the discharge papers or was aware of them and failed to deliver them to the detention officers when he returned Brianna Romero to the jail, or otherwise advise the officers of the instructions.
- 13. Brianna Romero was placed in a cell upon her return to the detention center but was discovered several hours later comatose on the floor of the cell, after having been ignored by detention center guards for several hours. Although she was found at approximately midnight on October 1, 2021, she was not returned to the hospital for another four to five hours.
- 14. Brianna Romero never left the hospital alive. She died on October 10, 2021. Her son, and her mother Barbara Romero, survived her. The Office of the Medical Investigator determined the cause of her death to be the toxic effects of multiple drugs, including fentanyl, cocaine, amphetamine, and benzodiazepines.

#### FIRST CLAIM FOR RELIEF - TORT CLAIMS ACT

- 15. The allegations of the General Allegations are incorporated herein by this reference.
- 16. Santa Fe County, through its detention center employees, was negligent in the treatment of Brianna Romero in at least the following respects: a) failure to make themselves aware of her medical condition; b) failure to read and follow discharge instructions provided by the hospital; c) failure to timely and properly monitor Brianna Romero in the jail; d) unreasonably delaying treatment for Brianna Romero; and e) failing to provide adequate medical care in the detention facility.

17. This is a tort claim for which immunity has been waived pursuant to Section 41-4-12 NMSA 1978.

# SECOND CLAIM FOR RELIEF-AGAINST THE CITY OF SANTA FE

- 18. The allegations of the General Allegations are incorporated herein by this reference.
- 19. The City of Santa Fe, through its police officers, was negligent in at least the following respects: a) failure to make themselves aware of her medical condition; b) failure to read and follow discharge instructions provided by the hospital and deliver the instructions to the detention center employees; c) failure to inform the county detention center employees of the discharge instructions; and (d) failure to transport Brianna Romero to the hospital initially rather than the jail.

## THIRD CLAIM FOR RELIEF - NEW MEXICO CIVIL RIGHTS ACT

- 20. The allegations of the General Allegations are incorporated herein by this reference.
- 21. Defendants deprived Brianna Romero of rights, privileges and immunities pursuant to the Bill of Rights of the Constitution of New Mexico, acting under color of state law and within the course and scope of their authority.
- 22. Brianna Romero was deprived of her rights to enjoy and defend life and liberty and to seek and obtain safety and happiness, and further suffered the deprivation of life and liberty without due process of law.

## FOURTH CLAIM FOR RELIEF- 42 U.S.C. 1983

- 23. The allegations of paragraphs 1-22 are incorporated herein by this reference.
- 24. The Defendant officers, Ornales and Hildebrant, deprived Brianna Romero of her rights to be free of cruel and unusual punishment under the Eighth Amendment to the United States Constitution and deprived her of life and liberty without due process of law in

violation of the Fifth and Fourteenth Amendments to the United States Constitution, acting under color of state law as Santa Fe police officers.

25. The Defendants Williams and Olivares, acting under color of state law, deprived Brianna Romero of her rights to be free of cruel and unusual punishment under the Eighth Amendment to the United States Constitution and deprived her of life and liberty without due process of law in violation of the Fifth and Fourteenth Amendments to the United States Constitution.

## **DAMAGES**

- 26. The allegations of Paragraphs 1-25 are incorporated herein by this reference.
- 27. As a direct and proximate result of the wrongful acts and omissions of Defendant as set forth above, Brianna Romero died, and Plaintiff has been harmed. Plaintiff seeks all damages recoverable under the Wrongful Death Act, including for lost earnings, pain, emotional distress, and loss of enjoyment of life. Plaintiff also seeks recovery of any medical and related expenses, burial and funeral expenses.
- 28. Plaintiff seeks compensation for loss of consortium for Brianna's surviving child,

WHEREFORE, Plaintiff prays that she have and recover judgement against the Defendants, and each of them, for all compensatory damages; for costs of suit incurred herein; for reasonable attorney's fees; for pre and post-judgement interest as provided by law; and for such other and further relief as the Court may deem to be just and proper.

Respectfully submitted,

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ. Clark, Jones, & Ruyle, LLC

432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

/s/ Doug Perrin

DOUG PERRIN, ESQ.

The Perrin Law Firm 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: dougperrin@perrinlaw.org

ATTORNEYS FOR PLAINTIFF

SUMMON	VS
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child,	Defendant: County of Santa Fe ATTN: County Clerk – Katharine E. Clark Address: 100 Catron Street Santa Fe, New Mexico 87501
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

## TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- 1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
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- 4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at <a href="https://www.nnibar.org">www.nnibar.org</a>; 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe County, New Mexico, this	26	day of	October	2023
Kathleen Vigil				

CLERK OF FIRST JUDICIAL DISTRICT COURT

Deputy

| Solution | S

369 Montezuma Ave. PMB #334

Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ.

Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

# THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )
COUNTY OF
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in county on the day of,, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

to, the person apparently in charge at the actual place of business or employment of the defendant and by mailing by first class mail to the defendant at (insert defendant's business address) and by mailing the summons and complaint by first class mail to the defendant at (insert defendant's last known mailing address).
[] to, an agent authorized to receive service of process for defendant
[] to, [parent] [guardian] [custodian] [conservator] [guardian ad litem] of defendant (used when defendant is a minor or an incompetent person).
[] to (name of person),, (title of person authorized to receive service. Use this alternative when the defendant is a corporation or an association subject to a suit under a common name, a land grant board of trustees, the State of New Mexico or any political subdivision).  Fees:
Signature of person making service
Title (if any)
Subscribed and sworn to before me this day of,²
Judge, notary or other officer authorized to administer oaths
Official title

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- 2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

SUMMON	NS
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of the Child, a Minor Child,	Defendant: City of Santa Fe ATTN: City Clerk – Kristine Bustos-Mihelcic Address: 200 Lincoln Avenue, Room 215, PO Box 909 Santa Fe, NM 87504-0909
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

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- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- **4.** If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; 1-800-876-6657; or 1-505-797-6066.

Dated at Santa Fe County, New Mexic Kathleen Vigil	o, this	_day of	, 2023.

CLERK OF FIRST JUDICIAL DISTRICT COURT

Dep ty

/s/Doug Perrin
Doug Perrin
The Perrin Law Firm
369 Montezuma Ave. PMB #334
Santa Fe, NM 87501

Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ. Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )	
COUNTY OF)	
I, being duly sworn, on oath, state that I are party to this lawsuit, and that I served this summon of,, by delivering a copattached, in the following manner:	m over the age of eighteen (18) years and not a as in county on the day by of this summons, with a copy of complaint
(check one box and fill in appropriate blanks)	
[] to the defendantsummons and complaint or refuses to accept the se	_ (used when defendant accepts a copy of ummons and complaint)
[] to the defendant by [mail] [courier service] service is by mail or commercial courier service).	
After attempting to serve the summons and complemail or commercial courier service, by delivering complaint attached, in the following manner:	
the usual place of abode of defendant, a perso	, (used when the defendant is not

(insert defendant's last known mailing address) a copy of	of the summons and
complaint.	
[] to, the person apparently in charge at the business or employment of the defendant and by mailing by first class mail (insert defendant's business address) and by mailing complaint by first class mail to the defendant at (insert known mailing address).	to the defendant at g the summons and
[] to, an agent authorized to receive served defendant	vice of process for
[] to, [parent] [guardian] [custodian] [conservator] of defendant (used when defendant is a minor person).	[guardian ad litem] or an incompetent
[] to (name of person), (title of person authorized to receive service. Use this alternative when corporation or an association subject to a suit under a common name, a la trustees, the State of New Mexico or any political subdivision).	the defendant is a and grant board of
Fees:	
Signature of person making service	
Title ( <i>if any</i> )  Subscribed and sworn to before me this day of, <sup>2</sup>	
Judge, notary or other officer authorized to administer oaths	
Official title	

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- 2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

[Adopted effective August 1, 1988; as amended by Supreme Court Order 05-8300-01, effective March 1, 2005; by Supreme Court Order 07-8300-16, effective August 1, 2007; by Supreme Court

Order No. 12-8300-026, effective for all cases filed or pending on or after January 7, 2013.]

SUMMON	NS
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child, vs.	Defendant: Richard Hildebrant Address: 2515 Camino Entrada Santa Fe, NM 87507 (505) 428-3710
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

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- **6.** If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at <a href="https://www.nmbar.org">www.nmbar.org</a>; 1-800-876-6657; or 1-505-797-6066.

Kathleen ∨igil Dated a	t Santa Fe County, New Mexic	co, this _26	_day of	October	, 2023
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CLERK OF FIRST JUDICIAL DISTRICT COURT

By: Jungulie District School Perrin Doug Perrin The Perrin Law Firm

369 Montezuma Ave. PMB #334

Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ.

Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

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STATE OF NEW MEXICO )
COUNTY OF)
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in county on the day of,, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
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After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
the usual place of abode of defendant, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
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business or	, the person apparently in charge at the actual place of employment of the defendant and by mailing by first class mail to the defendant at (insert defendant's business address) and by mailing the summons and
	by first class mail to the defendant at (insert defendant's last ing address).
[] to _ defendant _	, an agent authorized to receive service of process for
[] to _ of defendar person).	
(title of per corporation trustees, the	(name of person),, rson authorized to receive service. Use this alternative when the defendant is a or an association subject to a suit under a common name, a land grant board of state of New Mexico or any political subdivision).
Sign	ature of person making service
Title	e (if any)
Subscribed	and sworn to before me this day of,²
	ry or other officer o administer oaths
Official title	

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Court Telephone No. 505-455-8250  BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of the Child, a Minor Child,	Defendant: Ceasar Ornales Address: 2515 Camino Entrada Santa Fe, NM 87507 (505) 428-3710
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

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- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at <a href="https://www.nmbar.org">www.nmbar.org</a>; 1-800-876-6657; or 1-505-797-6066.

Kathleen Vig Pated at Santa Fe County, New Mexico	, this	day of _	October	, 2023

CLERK OF FIRST JUDICIAL DISTRICT COURT

By: Jugaline Deputy Doug Perrin Doug Perrin Law Firm

369 Montezuma Ave. PMB #334

Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ.

Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

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STATE OF NEW MEXICO )
COUNTY OF )
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in county on the day of,, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

[]	to	, the person apparently in charge at the actual place of
	ess or employment of the def	endant and by mailing by first class mail to the defendant at
		efendant's business address) and by mailing the summons and
		e defendant at (insert defendant's last
know	n mailing address).	
[]	to	, an agent authorized to receive service of process for
defer	dant	·
[]	to ,[p	arent] [guardian] [custodian] [conservator] [guardian ad litem]
of de	efendant	(used when defendant is a minor or an incompetent
perso		
[]	to	(name of person),,
(title	of person authorized to rece	eive service. Use this alternative when the defendant is a
		ject to a suit under a common name, a land grant board of
truste	es, the State of New Mexico of	r any political subdivision).
_		
Fees:		<u></u>
	Signature of person making	service
	Title ( <i>if any</i> )	
Subs	prihad and swarn to hafora ma	this day of, <sup>2</sup>
Subs	critical and sworm to before me	uns day or,
_	e, notary or other officer	
autho	rized to administer oaths	
Offic	ial title	_
	141 11110	

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BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child,  vs.  SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	Defendant: Derek Williams Address: 28 Camino Justicia Santa Fe, NM 87508 505-428-3231	

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Kathleen Vigil day of, 2025	Kathleen Vigil Dated at Santa Fe County, New Mexico,	this	day of	, 2023
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CLERK OF FIRST JUDICIAL DISTRICT COURT

By: Augulie Deputy Doug Perrin Doug Perrin Law Firm

369 Montezuma Ave. PMB #334

Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ.

Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

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STATE OF NEW MEXICO )
COUNTY OF )
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in county on the day of,, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

busin	o, the person apparently in charge at the actual place of or employment of the defendant and by mailing by first class mail to the defendant at (insert defendant's business address) and by mailing the summons and
comp	at by first class mail to the defendant at (insert defendant's last ailing address).
[] defen	, an agent authorized to receive service of process for t
[] of de perso	o
(title corpo truste	name of person),, person authorized to receive service. Use this alternative when the defendant is a ion or an association subject to a suit under a common name, a land grant board of the State of New Mexico or any political subdivision).
	ignature of person making service
	itle (if any)
Subso	ed and sworn to before me this day of,²
_	otary or other officer ed to administer oaths
Offic	itle

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- 2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

SUMMONS		
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen	
Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	McGarry	
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child,	Defendant: Melquiades Olivares Address: 28 Camino Justicia Santa Fe, NM 87508 505-428-3231	
vs.		
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES		

## TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- 1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- **4.** If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; 1-800-876-6657; or 1-505-797-6066.

Cathleen Vigil ated at Santa Fe County, New Mexico, this	26	day of October	, 2023
--	----	----------------	--------

CLERK OF FIRST JUDICIAL DISTRICT COURT

By: Jungalise Deputy District Doug Perrin Doug Perrin The Perrin Law Firm

369 Montezuma Ave. PMB #334

Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117

Email: dougperrin@perrinlaw.org

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ.

Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )
COUNTY OF )
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in county on the day of,, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

business or employment of the defendation (insert defendation)	the person apparently in charge at the actual place of ant and by mailing by first class mail to the defendant at dant's business address) and by mailing the summons and
complaint by first class mail to the de known mailing address).	fendant at (insert defendant's last
[] to, defendant	an agent authorized to receive service of process for
[] to, [paren of defendant, person).	t] [guardian] [custodian] [conservator] [guardian ad litem] _ (used when defendant is a minor or an incompetent
(title of person authorized to receive	,
Signature of person making serv	rice
Title (if any)	
Subscribed and sworn to before me this	day of, <sup>2</sup>
Judge, notary or other officer authorized to administer oaths	
Official title	

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- 2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

FILED 1st JUDICIAL DISTRICT COURT
Santa Fe County
11/13/2023 8:40 AM
KATHLEEN VIGIL CLERK OF THE COURT
Sharon Atencio

SUMMON	NS RETURN
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child, vs.	Defendant: Richard Hildebrant Address: 2515 Camino Entrada Santa Fe, NM 87507 (505) 428-3710
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

## TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- 1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- 4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at <a href="https://www.nmbar.org">www.nmbar.org</a>; 1-800-876-6657; or 1-505-797-6066.

Cathlean Vini	Dated at Santa Fe County, New Me	exico, this 26	day of	October	202
Cathleen Viol	Dated at Santa Fe County, New Me	exico, this	day of	. Octobel	203

CLERK OF FIRST JUDICIAL DISTRICT COURT

Deputy Deputy State Of the Perrin Law Firm

369 Montezuma Ave. PMB #334 Santa Fe, NM 87501

Phone: 505-989-8800 Fax: 214-646-6117

Email:

/s/ Samuel P. Ruyle
SAMUEL P. RUYLE, ESQ.
Clark, Jones, & Ruyle, LLC
432 Galisteo St.
Santa Fe, NM 87501
(505) 820-1825
Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )
COUNTY OF
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Santa fee county on the of day of Monday of Manager 13, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

	to	, the person apparently in charge at the actual place of
busi	ness or employment of the defen	dant and by mailing by first class mail to the defendant at
	(insert defe	endant's business address) and by mailing the summons and
com	plaint by first class mail to the	defendant at (insert defendant's last
knov	wn mailing address).	
[ }*-	to <u>Ken Vauch</u> indant <u>Richard Hale</u>	In agent authorized to receive service of process for established for Could Cherk's Office.
[] of d perso	lefendant	ent] [guardian] [custodian] [conservator] [guardian ad litem] (used when defendant is a minor or an incompetent
		(name of person),, we service. Use this alternative when the defendant is a
corp	oration or an association subjec	t to a suit under a common name, a land grant board of
trust	tees, the State of New Mexico or a	ny political subdivision).
152		
Fees	)-e 	****
	Signature of person making se	
	Title (if any)	
Subs	scribed and sworn to before me th	is 64h day of November, 20032
Judg autho	re in the policy of the policy	STATE OF NEW MEXICO NOTARY PUBLIC ROCIO M. SERRANO COMMISSION NUMBER 112275 EXPIRATION DATE 12-15-20-4

 Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.

USE NOTE

2. If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

FILED 1st JUDICIAL DISTRICT COURT
Santa Fe County
11/13/2023 8:42 AM
KATHLEEN VIGIL CLERK OF THE COURT
Sharon Atencio

SUMMO	NS RETURN
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry RETURN
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of A Minor Child,	Defendant: Derek Williams Address: 28 Camino Justicia Santa Fe, NM 87508 505-428-3231
vs.	
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

## TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- 1. A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- 4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; 1-800-876-6657; or 1-505-797-6066.

Kathleen Dated at Santa Fo	e County, New Mexico	, this	day of	October	, 2023.
[1997 SERVER SER					

CLERK OF FIRST JUDICIAL DISTRICT COURT

Deputy Deputy Doug Perrin Caw Firm

369 Montezuma Ave. PMB #334 Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117 Email:

/s/ Samuel P. Ruyle
SAMUEL P. RUYLE, ESQ.
Clark, Jones, & Ruyle, LLC
432 Galisteo St.
Santa Fe, NM 87501
(505) 820-1825
Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )	
COUNTY OF	
party to this lawsuit, and that I served this summe	am over the age of eighteen (18) years and not a ons in <u>Start Afc</u> county on the <u>G</u> * day opy of this summons, with a copy of complaint
(check one box and fill in appropriate blanks)	
[] to the defendant	(used when defendant accepts a copy of summons and complaint)
to the defendant by [mail] [courier service service is by mail or commercial courier service]	e] as provided by Rule 1-004 NMRA (used when ).
	plaint on the defendant by personal service or by ring a copy of this summons, with a copy of
the usual place of abode of defendant	on over fifteen (15) years of age and residing at , (used when the defendant is not ng by first class mail to the defendant at own mailing address) a copy of the summons and
complaint,	

	to, the person appr	arently in charge at the actual place of			
busin	ness or employment of the defendant and by maili	ng by first class mail to the defendant at			
	(insert defendant's business of	address) and by mailing the summons and			
com	plaint by first class mail to the defendant at	(insert defendant's last			
	m mailing address).				
	**				
W	to Ken (Aucha), an agent author	orized to receive service of process for			
defer	to <u>Ken (Aucha)</u> , an agent authoridant <u>Dereje Eilliam (</u> San	th Fe Could Cherk's	office		
	to, [parent] [guardian] [cu	stodian] [conservator] [guardian ad litem]			
of de	efendant (used when d	lefendant is a minor or an incompetent			
perse					
	SSS AFT				
	to (name of of person authorized to receive service. Use t	person),,			
(title	of person authorized to receive service. Use t	his alternative when the defendant is a			
	oration or an association subject to a suit under				
irust	ees, the State of New Mexico or any political subdiv	vision).			
Fees:					
	TROV CARRITY				
	Signature of person making service				
	Title (if any)				
	il.				
Subs	cribed and sworn to before me this 💋 day of 📐	buender 2003	•		
KE	N. DELLES				
	e, notary or other officer	росположений файлайский почучурований изменений и			
	prized to administer oaths	STATE OF NEW MEXICO			
rod	NOTARY PUBLIC ROCIO M. SERRANO				
	ial title	COMMISSION NUMBER 1122751			
		EXPIRATION DATE 12-15-2026			

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

Santa Fe County 11/13/2023 8:43 AM KATHLEEN VIGIL CLERK OF THE COURT

Sharon Atencio

SUMMO	NS Return
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child,	Defendant: Ceasar Ornales Address: 2515 Camino Entrada Santa Fc, NM 87507 (505) 428-3710
ys.	
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

## TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule I-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- 4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- 5. You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at <a href="https://www.nmbar.org">www.nmbar.org</a>; 1-800-876-6657; or 1-505-797-6066.

	26		October	
Kathleen VigPated at Santa Fe County, New Mexico,	this	day of _	*	2023.

CLERK OF FIRST JUDICIAL DISTRICT COURT

By: Sepulse Cual District School Perrin Doug Perrin he Perrin Law Firm

369 Montezuma Ave. PMB #334 Santa Fe, NM 87501

Phone: 505-989-8800 Fax: 214-646-6117

Email:

/s/ Samuel P. Ruyle

SAMUEL P. RUYLE, ESQ. Clark, Jones, & Ruyle, LLC 432 Galisteo St. Santa Fe, NM 87501 (505) 820-1825

Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO )
COUNTY OF )
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in SANFAFE county on the CHOAN of November, 23, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at(insert defendant's last known mailing address) a copy of the summons and
complaint.

[] to	, the person apparently in charge at the actual place of
business or employme	ent of the defendant and by mailing by first class mail to the defendant at
	(insert defendant's business address) and by mailing the summons and
complaint by first cla	ss mail to the defendant at (insert defendant's last
known mailing addres	
2	G V
[} to / Ten	VAUCHIM, an agent authorized to receive service of process for
defendant <u>( e/1564</u>	VAUCHN, an agent authorized to receive service of process for a process for Electrical Santa Fe Count 1 Checks office
[] to	, [parent] [guardian] [custodian] [conservator] [guardian ad litem]
of defendant	(used when defendant is a minor or an incompetent
person).	
•	
[] to	(name of person),,  rized to receive service. Use this alternative when the defendant is a
(title of person author	rized to receive service. Use this alternative when the defendant is a
	ociation subject to a suit under a common name, a land grant board of
보인 그 그래픽스 이번에게 하면 하나 이 모든 그리지는 를 다양한 경우 [17.17.18]	lew Mexico or any political subdivision).
	and the second of the second
Fees:	
	GARRILX
Signature of pe	ason making service
- ,	
Title (if any)	
	, 44
Subscribed and sworn	to before me this 6th day of November 2023
$\overline{O}$	
Kocio M De	All Andrews Commencer of the Commencer o
Judge, notary or other	officer STATE OF NEW MEXICO
authorized to administ	er oaths NOTARY PUBLIC
Notory Public	ROCIO M. SERRANO
Official title	COMMISSION NUMBER 1122751 EXPIRATION DATE 12-15-2026
	1 ( 1 ( 1 ( 1 ( 1 ( 1 ( 1 ( 1 ( 1 ( 1 (

- Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.

FILED 1st JUDICIAL DISTRICT COURT
Santa Fe County
11/13/2023 8:45 AM
KATHLEEN VIGIL CLERK OF THE COURT
Sharon Atencio

SUMMO	NS RETURN
District Court: 1st JUDICIAL DISTRICT Santa Fe County, New Mexico Court Address: 225 Montezuma Ave. Santa Fe, NM 87501 Court Telephone No. 505-455-8250	Case Number: D-101-CV-2023-02404 Assigned Judge: Ellenwood, Kathleen McGarry
BARBARA ROMERO, Individually and as Personal Representative of the Estate of BRIANNA ROMERO and as Next Friend On behalf of Child, vs.	Defendant: Melquiades Olivares Address: 28 Camino Justicia Santa Fe, NM 87508 505-428-3231
SANTA FE COUNTY; CITY OF SANTA FE; CEASAR ORNALES, RICHARD HILDEBRANT, DEREK WILLIAMS, and MELQUIADES OLIVARES	

#### TO THE ABOVE NAMED DEFENDANT(S): Take notice that

- A lawsuit has been filed against you. A copy of the lawsuit is attached. The Court issued this Summons.
- 2. You must respond to this lawsuit in writing. You must file your written response with the Court no later than thirty (30) days from the date you are served with this Summons. (The date you are considered served with the Summons is determined by Rule 1-004 NMRA) The Court's address is listed above.
- 3. You must file (in person or by mail) your written response with the Court. When you file your response, you must give or mail a copy to the person who signed the lawsuit.
- 4. If you do not respond in writing, the Court may enter judgment against you as requested in the lawsuit.
- You are entitled to a jury trial in most types of lawsuits. To ask for a jury trial, you must request one in writing and pay a jury fee.
- 6. If you need an interpreter, you must ask for one in writing.
- 7. You may wish to consult a lawyer. You may contact the State Bar of New Mexico for help finding a lawyer at www.nmbar.org; 1-800-876-6657; or 1-505-797-6066.

Kathleen Vigil ated at Santa Fe County, New Mexico, this	day of October, 2023.
--	-----------------------

CLERK OF FIRST JUDICIAL DISTRICT COURT

Deputy Deputy

/s/Doug Perrin
Doug Perrin
The Perrin Law Firm

369 Montezuma Ave. PMB #334 Santa Fe, NM 87501 Phone: 505-989-8800 Fax: 214-646-6117 Email:

/s/ Samuel P. Ruyle
SAMUEL P. RUYLE, ESQ.
Clark, Jones, & Ruyle, LLC
432 Galisteo St.
Santa Fe, NM 87501
(505) 820-1825
Email: sam@santafelawyers.org

THIS SUMMONS IS ISSUED PURSUANT TO RULE 1-004 OF THE NEW MEXICO RULES OF CIVIL PROCEDURE FOR DISTRICT COURTS.

STATE OF NEW MEXICO
STATE OF NEW MEXICO ) COUNTY OF )
I, being duly sworn, on oath, state that I am over the age of eighteen (18) years and not a party to this lawsuit, and that I served this summons in Santa fe county on the Orday of November 23, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
(check one box and fill in appropriate blanks)
[] to the defendant (used when defendant accepts a copy of summons and complaint or refuses to accept the summons and complaint)
[] to the defendant by [mail] [courier service] as provided by Rule 1-004 NMRA (used when service is by mail or commercial courier service).
After attempting to serve the summons and complaint on the defendant by personal service or by mail or commercial courier service, by delivering a copy of this summons, with a copy of complaint attached, in the following manner:
[] to, a person over fifteen (15) years of age and residing at the usual place of abode of defendant, (used when the defendant is not presently at place of abode) and by mailing by first class mail to the defendant at (insert defendant's last known mailing address) a copy of the summons and
complaint.

[]	to	the person apparently in charge at the actual place of
busi	ness or empl	oyment of the defendant and by mailing by first class mail to the defendant at
com	plaint by firs	(insert defendant's business address) and by mailing the summons and t class mail to the defendant at (insert defendant's last
	vn mailing ac	
[4 <del>]</del> - defe	to <u>/ </u>	LAUGHY, an agent authorized to receive service of process for Laughber Sauth Fe County Cherle's Office
	to	, [parent] [guardian] [custodian] [conservator] [guardian ad litem]
of d	efendant	(used when defendant is a minor or an incompetent
pers		
	to	(name of person),
(title	of person	(name of person),, authorized to receive service. Use this alternative when the defendant is a
corp	oration or a	n association subject to a suit under a common name, a land grant board of
		of New Mexico or any political subdivision).
	•	
Fees	:	
		of person making service
	Signature	of person making service
	Title (if an	ny)
	10.00	
Subs	cribed and s	worn to before me this 6 th day of Nov Onber, 2023
Ka	áu M	Darrunce
	e, notary or	
autho	orized to adn	imister oaths NOTARY PUBLIC
NO	tory Pu	NOCIO M. SERRANO
Offic	cial title	COMMISSION NUMBER 1122751
		EXPIRATION DATE 12-15-2028

- 1. Unless otherwise ordered by the court, this return is not to be filed with the court prior to service of the summons and complaint on the defendant.
- If service is made by the sheriff or a deputy sheriff of a New Mexico county, the signature of the sheriff or deputy sheriff need not be notarized.